

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

August 9, 2022

BY ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

RE: United States v. Burgos-Hernandez et al.
22 Cr. 133 (JGK)

Dear Judge Koeltl:

I write on behalf of my client, Franklin Bello Jimenez, in the above-captioned matter, to respectfully request that the Court modify Mr. Bello Jimenez's bail conditions to allow him to travel to Boston, MA to visit his mother on Sunday, August 14. Pretrial services consents to this request; the government defers to pretrial.

On February 17, 2022, Magistrate Judge Gabriel W. Gorenstein released Mr. Bello Jimenez on his own signature and imposed the following bail conditions: a \$25,000 personal recognizance bond cosigned by two financially responsible persons; travel limited to the SDNY/EDNY; surrender all travel documents with no new applications; pretrial supervision as directed by pretrial services; maintain or seek employment; no contact with co-defendants except in the presence of counsel; no new loans or lines of credit without prior approval from pretrial services. Mr. Bello Jimenez's bail conditions were timely satisfied.

For the past six months, Mr. Bello Jimenez has remained compliant with the conditions of release. Mr. Bello Jimenez now seeks the Court's permission to travel to visit his mother, who is ill, on Sunday, August 14, at an address to be provided to pretrial. Pretrial services consents to this request; the government defers to pretrial.

Thank you for your consideration of this request.

Respectfully submitted,

/s/
Marne L. Lenox
Assistant Federal Defender
(212) 417-8721

SO ORDERED:

John G. Koeltl
HONORABLE JOHN G. KOELTL
United States District Judge
8/10/22

cc: Sarah Kushner, Assistant U.S. Attorney